

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

FILED
EASTERN DISTRICT OF WISCONSIN

'05 FEB 23 A9:02

ALBERT PATTERSON d/b/a)
WORLD WRESTLING ASSOCIATION,)
SUPERSTARS OF WRESTLING, INC. and)
d/b/a W.W.A. SUPERSTARS)

EP
SOPHON B. DEBELSKY
CLERK

Plaintiff

No. 03 C 0374

v.

JUDGE RHANDA

WORLD WRESTLING ENTERTAINMENT, INC)
and GOOD HUMOR CORPORATION, d/b/a)
Good Humor Breyers Ice Cream)
Defendants

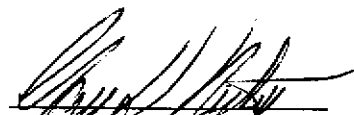
JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR LEAVE TO FILE PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION FOR SANCTIONS OR IN THE ALTERNATIVE, MOTION TO
COMPEL INSTANTER

Plaintiff hereby moves for leave to file his Response to Defendants' Motion for Sanctions
or in the alternative Motion to Compel instanter

On January 21, 2005, Defendants filed an oversized 22 page brief, a deposition transcript
of 468 pages, with 59 exhibits thereto plus a one inch thick volume of additional exhibits in
support of their Motion. The response required an extensive amount of time to prepare. Due to a
large number of depositions in other litigation, plaintiff's counsel, who is a sole practitioner, did
not have time to respond at an earlier time. The response and exhibits thereto are filed
simultaneously with this motion.

Wherefore plaintiff requests leave to file this response instanter, and for such other relief
that the court in its discretion may deem appropriate.



Charles Drake Boutwell, as attorney for Plaintiff

Charles Drake Boutwell
3075 Plum Island Drive
Northbrook, Ill 60062
847-272-2126

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on February 23, 2005, he caused the service of PLAINTIFF'S MOTION FOR LEAVE TO FILE A RESPONSE TO DEFENDANT'S MOTION FOR SANCTIONS OR IN THE ALTERNATIVE, MOTION TO COMPEL INSTANTER on Curtis Krasik and Julie R. Fernstermaker, KIRKPATRICK & LOCKHART LLP, Henry W. Oliver Building, 535 Smithfield Street, Pittsburgh, Pennsylvania 15222 and Shepard A. Davis, BURTON & DAVIS, LLP, 611 N. Broadway, Milwaukee, WI 53202 counsel for the Defendants World Wrestling Entertainment, Inc and Conopco, Inc. via mail.

By:


Plaintiff's Attorney